

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Edward Komito,

Plaintiff,

v.

Thomson Reuters Holdings, Inc. et al.,

Defendants.

Civil Action No. 5:19-cv-04679-JLS

[PROPOSED] ORDER

AND NOW, good cause appearing, it is on this ____ day of _____, 2019,
ordered as follows:

1. Defendants are hereby temporarily restrained and enjoined from disclosing any Information regarding Plaintiff;

2. Defendants are further restrained and enjoined from benefitting from any disclosure that any Defendant received prior to the entry of this Order which disclosed any Information regarding Plaintiff; Defendants shall provide Plaintiff with a full accounting of all such benefits and disclosures and it is further;

3. Defendants are to establish additional appropriate safeguards above and beyond those safeguards (if any) currently in place in order to prevent a recurrence of said issuance of Defendants' false, defamatory, libelous and misleading reports in the future. Such reports will meet with the approval of both the Court as well as Plaintiff;

4. Defendants must, within twenty (20) days of this Order, provide to Plaintiff a full and complete listing of any and all individuals or entities who have requested, accessed or received such reports (pertaining to the Plaintiff) over the past three (3) years, including any predecessor entities of the current Defendants;

5. Defendants must show cause why this Court should not issue a permanent injunction extending such temporary relief pending an adjudication of this matter on the merits, and

6. IT IS FURTHER ORDERED that a hearing date be set down as soon as possible for a permanent injunction against the Defendants, from issuing false, misleading, defamatory, libelous and misleading reports as respects Plaintiff, and it is further;

7. ORDERED a letter(s) of correction acknowledging the erroneous previously issued report(s) be sent to each and every individual or entity who accessed or received such report over the past three (3) years. Said letter(s) to be personally signed by the CEO of Thomson Reuters Corporation., James C. Smith, (or such other executive as this Court deems appropriate) with a copy to be provided to Plaintiff and approved by Plaintiff prior to mailing.

8. Providing such other equitable relief as this Court deems appropriate.

HON. JEFFREY SCHMEHL
United States District Judge



[REDACTED]
1326 Doe Trail Road
Allentown, PA 18104-2053

U.S.M.S.
X-RAY

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Edward N. Cahn US Courthouse & Federal Building
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